

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-293-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;	)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,	)	
INC.; SAMSUNG SEMICONDUCTOR	)	
INC.,	)	
	)	
Defendants.	)	

---

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:22-cv-294-JRG
	)	
	)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON	)	
SEMICONDUCTOR PRODUCTS, INC.;	)	
MICRON TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

---

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S  
OPPOSITION TO MICRON'S MOTION TO COMPEL PLAINTIFF TO  
PRODUCE EXPERT REPORTS FROM RELATED CASES (DKT. 222)**

**I, Yanan Zhao, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiff Netlist, Inc. (“Netlist”) in the above captioned action. I am a member of good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposition to Micron’s Motion to Compel Plaintiff to Produce Expert Reports from Related Cases (Dkt. 222).

2. Attached as **Exhibit 1** is a true and correct copy of email correspondence from Samsung’s counsel to Netlist’s counsel dated November 17, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the transcript of the Motion Hearing that took place on August 22, 2023 in the case Netlist, Inc. v. Micron Technology, Inc., No. 2:22-cv-203-JRG (“*Micron I*”).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 7, 2023, in Los Angeles, California.

By /s/ Yanan Zhao  
Yanan Zhao